

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE NEW YORK TIMES COMPANY and
CHARLIE SAVAGE,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF JUSTICE,

Defendant.

25 Civ. 4199 (CM) (JW)

STIPULATION OF VOLUNTARY DISMISSAL

WHEREAS, on or about May 19, 2025, Plaintiffs The New York Times Company and Charlie Savage (together, “The Times”) filed this suit in the United States District Court for the Southern District of New York pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), seeking the release of certain records allegedly possessed by Defendant United States Department of Justice (“DOJ”), in connection with a FOIA request for the same records, dated March 20, 2025 (the “FOIA Request”);

WHEREAS, on or about June 23, 2025, DOJ filed an answer to The Times’s Complaint;

WHEREAS, DOJ has released to The Times non-exempt portions of records responsive to the FOIA Request;

WHEREAS, The Times has determined that it will not pursue further release of information or documents and now wishes voluntarily to discontinue this action;

IT IS HEREBY STIPULATED AND AGREED by and between the parties as follows:

1. The Complaint shall be dismissed with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) without costs and without attorneys’ fees or conferral of prevailing party status pursuant to FOIA or any other federal statute.

2. The Times agrees to withdraw the Request from further processing by DOJ, and to dismiss with prejudice any and all claims that The Times now has or may hereafter acquire against DOJ or the United States of America related to or arising out of the Request.

3. Nothing in this Stipulation affects, or shall be construed to affect, the rights of The Times to pursue further release of information or documents from DOJ through other FOIA requests.

4. The parties understand and agree that this Stipulation contains the entire agreement between them, and that no statements, representations, promises, agreements, or negotiations, oral or otherwise, between the parties or their counsel that are not included herein shall be of any force or effect.

Dated: New York, New York
August 4, 2025

THE NEW YORK TIMES COMPANY

By: David McCraw
DAVID E. MCCRAW
The New York Times Company
Legal Department
620 8th Avenue
New York, NY 10018
Phone: (212) 556-4031
Fax: (212) 556-4634
Email: mccraw@nytimes.com

Counsel for Plaintiff

JAY CLAYTON
United States Attorney
Southern District of New York

By: Tomoko Onozawa
TOMOKO ONOZAWA
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, New York 10007
Phone: (212) 637-2721
Fax: (212) 637-2686
Email: tomoko.onozawa@usdoj.gov

Counsel for Defendant